

October 19, 2007

Dr. Bruce Hatton, Superintendent
Washington Community Schools #1405
301 East South Street
Washington, Indiana 47501

Dear Dr. Hatton:

On August 30, 2007, the Indiana Department of Education's (IDOE) Title I monitoring team commenced an on-site monitoring review of Washington Community Schools' administration of Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the *No Child Left Behind Act* (NCLB). Enclosed is a report based upon this review.

Prior to, during, and following the on-site monitoring review, the IDOE team conducted a number of activities (described in the attached report) to verify compliance with 1) the programmatic requirements of Title I, Part A; and 2) the fiscal requirements that must be followed by recipients of Title I, Part A educational funds.

The enclosed report summarizes the results of our on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, **Washington Community Schools is responsible for taking appropriate action to remedy compliance deficiencies**. In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer-term measures are necessary, Washington Community Schools must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE will be happy to provide technical assistance as appropriate.

The IDOE team would like to thank Mrs. Rebecca Dayton and other staff for their work and assistance provided prior to and during the review in gathering materials and providing access to information in a timely manner.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities, and in assisting Washington Community Schools to improve the delivery of Title I services.

Sincerely,

Lee Ann Kwiatkowski, Director
Division of Compensatory Education

cc: Mrs. Rebecca Dayton, Title I Program Administrator
Washington Community Schools #1405

Ms. Linda Miller, Assistant Superintendent of Community Relations
and Special Populations, IDOE

**Indiana Department of Education
Title I, Part A Monitoring**

District: Washington Community Schools

Monitoring Date: August 30, 2007

Monitoring Team: Cindy Hurst, Lenée Reedus, Brenda Martz, Linda Ricketts, Sarah Pies, and Laura Cope

Background Information

The Indiana Department of Education (IDOE) commenced on-site monitoring of Washington Community Schools on August 30, 2007. The purpose of this monitoring visit was to identify areas of strength, areas that need improvement, and areas of non-compliance with Title I, Part A and federal grants management (fiscal) requirements.

IDOE specifically monitored in the following areas:

Monitoring Topic	Statutory Citation
1) Compliance with professional qualification requirements for teachers and paraprofessionals	NCLB §1111(h)(6)(A) NCLB §1119(c)(1) NCLB §9101(23)
2) Compliance with parental involvement requirements	NCLB §1118(a)-(h) NCLB §1111(c)(14) NCLB §1111(d) NCLB §1116(a)(1)(D) NCLB §9101(32)
3) Compliance with professional development requirements	NCLB §1116(a)(1)(D) NCLB §9101(34)
4) Compliance with school improvement requirements	NCLB §1116(b) NCLB §1116(c) NCLB §1116(e)
5) Compliance with district improvement requirements	NCLB §1116(c)
6) Compliance with schoolwide program requirements	NCLB §1114
7) Compliance with targeted assistance program requirements	NCLB §1115
8) Compliance with school ranking and serving requirements	NCLB §1113
9) Compliance with comparability requirement	NCLB §1120A

10) Compliance with maintenance of effort requirement	NCLB §1120A NCLB §9521
11) Compliance with equitable services to private school students requirements	NCLB §1120
12) Compliance with statutory set-aside requirements	NCLB §1113 NCLB §1116 NCLB §1118
13) Compliance with supplement, not supplant requirements	NCLB §1120A
14) Compliance with financial management systems requirements	EDGAR §80.20 EDGAR §80.36
15) Compliance with compensation for personnel services requirements	OMB Circular A-87, Attachment B, Section 8
16) Compliance with complaint procedures	Subpart F—Complaint Procedure (CFR, Title 34)
17) Compliance with equipment requirements	EDGAR §80.32 OMB Circular A-87
18) Compliance with Neglected Institutes	NCLB §1401
19) Compliance with Delinquent Institutes	NCLB §1401

During the on-site visit, IDOE spent time interviewing staff from Washington Community Schools at their central office. In addition, IDOE visited two schools, Lena Dunn Elementary and Helen Griffith Elementary, where interviews were conducted with the principals and the Title I staff.

IDOE also reviewed Washington Community School's documents, including district policies and procedures, district notices to parents, district plans, school plans, personnel information, budget documents, contracts, and expenditure reports.

Based on the above information, our report follows.

Monitoring Topic 1: Compliance with NCLB Professional Qualification Requirements for Teachers and Paraprofessionals

Background

IDOE interviewed the Title I Program Administrator and two Title I building principals regarding professional qualification requirements. In addition, IDOE reviewed central office and school documentation and notices to parents.

Statutory Requirement: Professional qualifications requirements are contained in Sections 1111 and 1119 of Title I. In addition, “highly qualified” is defined in Section 9101(23) of the general provisions section of NCLB.

Areas of Compliance

Paraprofessionals: Washington Community Schools provided evidence that instructional paraprofessionals work under the direct supervision of a highly qualified teacher, which means that the teacher plans the instructional support activities for the paraprofessional to carry out, evaluates the achievement of the students with whom the paraprofessional is working, and the paraprofessional works in close and frequent proximity to the teacher.

5% Set-Aside: Washington Community Schools did not reserve 5% of its allocation in 2007-2008 to support assisting teachers in reaching the professional qualification requirements. All teachers in Title I schools are highly qualified, based on a random sampling of teachers and paraprofessionals from both Title I schools.

Parents’ Right to Know Regarding Non-highly Qualified Teacher: Washington Community Schools did not have any students taught by a teacher for four or more consecutive weeks who was not highly qualified.

Principal Attestation: Washington Community Schools ensured that the principal of every school receiving Title I funds attests annually, in writing, as to whether the school is in compliance with the professional qualification requirements of NCLB. As part of the annual Title I application review, grant approval is not given unless each principal has signed the grant attesting that their school is compliant with the professional qualification requirements of NCLB.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 1

Parents’ Right to Know Regarding Request for Teacher Qualifications: Washington Community Schools distributed the Parents’ Right to Know letter during summer registration 2007, but could not provide evidence of distribution.

Required Action: Washington Community Schools must ensure that all parents in a Title I building receive the Parents' Right to Know letter, through either a mailing or a systematic method, so that documentation can be provided.

The letter must be distributed to parents for school year 2007-2008. Evidence of distribution must be submitted to IDOE.

Professional Qualification Requirements: Washington Community Schools provided evidence that all core academic teachers and instructional paraprofessionals meet the highly qualified requirements, based on a random sampling of teachers and paraprofessionals from both Title I schools.

Recommendation: IDOE recommends that Washington Community Schools annually update each teacher's current assignment and place all teacher documents (i.e., licenses, HOUSSE documentation, and current teaching assignment) together in one folder in one location (either at the schools or central office).

Monitoring Topic 2: Compliance with Parental Involvement Requirements

Background

IDOE interviewed the Title I Program Administrator and two Title I building principals regarding parental involvement requirements. In addition, IDOE reviewed policies, compacts, and other documentation provided prior to and during on-site visit.

Statutory Requirement: Parental involvement requirements are contained throughout Title I, specifically in Sections 1111, 1116, and 1118. In addition, parental involvement is defined in Section 9101(23) of the general provisions section of NCLB.

Areas of Compliance

Annual Meeting: Washington Community Schools showed evidence that both Title I schools held an annual meeting for Title I parents in August 2007.

Parent Information Resource Center (PIRC): Washington Community Schools showed evidence of PIRC information being included in recent newsletters at both Title I schools.

Building Schools' and Parents' Capacity for Strong Parental Involvement: Washington Community Schools showed evidence of building capacity with its Title I parents. For instance, Lena Dunn Elementary and Helen Griffith Elementary both had interpreters available at several parent meetings for the Spanish-speaking population. Washington Community Schools also participates in the annual Parents in Education conference held in Vincennes, Indiana.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 2

LEA Parental Involvement Policy: Washington Community Schools showed evidence of a district parental involvement policy that included all statutory components. The policy was not developed or revised with parental input, as required in NCLB, nor was there evidence of distribution to parents.

Required Action: Washington Community Schools must ensure that it annually revises its LEA Parental Involvement Policy. Title I parents must be included in the development or revision of the policy. Documentation of such meetings must be kept. The LEA policy must be distributed, through either a mailing or a systematic method so that documentation can be provided.

Evidence of revision to the policy, with Title I parental input, during the 2007-2008 school year must be provided to IDOE within 30 business days of the date of this letter.

School Parental Involvement Policy: Washington Community Schools did not show evidence of parental involvement policies for Lena Dunn Elementary and Helen Griffith Elementary that included all statutory components (Attachments A1 and A2). Policies must be developed or revised with Title I parental input and distributed to parents.

Required Action: Washington Community Schools must ensure that both Title I schools develop and annually revise their School Parental Involvement policies and that all statutory components are included in the policies. Title I parents must be included in the development or revision of those policies. Documentation of such meetings must be kept. School policies must be distributed to parents through either a mailing or a systematic method so that documentation can be provided.

Policies (which contain all statutory components) and evidence of the development of the policies with Title I parental input during the 2007-2008 school year must be provided to IDOE within 30 business days of the date of this letter.

School-Parent Compact: Washington Community Schools showed evidence of school-parent compacts for both Lena Dunn Elementary and Helen Griffith Elementary, but neither school-parent compact included all statutory components (Attachments B1 and B2), nor were they revised with Title I parental input. There was no evidence of distribution to parents.

Required Action: Washington Community Schools must ensure that both Title I schools annually revise their school-parent compacts and that all statutory components are included in the compacts. Title I parents must be included in the development or revision. Documentation of such meetings must be kept.

School-parent compacts must be distributed to parents, through either a mailing or a systematic method so that documentation can be provided.

Updated school-parent compacts (which contain all statutory components) and evidence of the revision to the policies with Title I parental input during the 2007-2008 school year must be provided to IDOE within 30 business days of this letter.

Reviews Effectiveness of Parental Involvement Activities: Washington Community Schools did not provide evidence that the effectiveness of Title I parental involvement activities are reviewed.

Required Action: Washington Community Schools must develop an evaluation for the effectiveness of the parental involvement activities, which may include evaluations for parents to complete after participating in an activity.

Monitoring Topic 3: Compliance with Professional Development Requirements

Background

IDOE interviewed the Title I Program Administrator regarding professional development requirements.

Statutory Requirement: Professional development requirements are contained throughout Title I, Part A. Professional development is defined in Section 9101(34) of the general provisions section of NCLB. Under Section §1116(a)(1)(D), school districts are responsible for reviewing the effectiveness of professional development activities carried out with Title I funds.

Areas of Compliance

High Quality, Ongoing Professional Development: Washington Community Schools provided evidence that professional development opportunities in the district and Title I schools met the requirements set-forth in Title IX of NCLB. Three outside consultants are working with the district on writing, data collection and analysis, and reading across the curriculum.

Additionally, Washington Community Schools had a “System to System” structure (STS) allowing dialogue among teachers, principals, and central office administrators on a regular and on going basis.

For the 2007-2008 school year, Title I funds at Lena Dunn Elementary are being utilized to hire a paraprofessional to work with English Language Learners during the day and provide training to teachers in the evening. The paraprofessional will help build the teachers’ Spanish fluency to work more effectively with their Spanish-speaking students and families.

Evaluation of Professional Development Activities: Washington Community Schools demonstrated that it regularly reviews the effectiveness of professional development. Teachers in the elementary schools have rubrics that match specific instructional strategies so they can self-monitor and seek additional support, if necessary. The outside consultants use the information to help focus their training. Quarterly student assessments help inform instruction and provide information to educators on the quality of instruction in the classroom.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 3

None.

Monitoring Topic 4: Compliance with school improvement, corrective action, restructuring, and alternative governance requirements; including proper implementation of public school Choice and Supplemental Educational Services.

Background

IDOE interviewed the Title I Program Administrator and two Title I building principals regarding school improvement issues. Both Title I served schools, Lena Dunn Elementary and Helen Griffith Elementary, are identified for school improvement for the 2007-2008 school year.

Statutory Requirement: School improvement, corrective action, restructuring, and alternative governance requirements, including proper implementation of public school choice and supplemental educational services are contained in Section 1116. Depending on the number of years a school has not made adequate yearly progress (AYP), the school, district, and in certain cases state, must take certain actions.

Areas of Compliance

Technical Assistance: Washington Community Schools provided evidence of providing technical assistance to Lena Dunn Elementary and Helen Griffith Elementary regarding school improvement actions. Staff at both schools were aware of the requirements of school improvement status. Additionally, the district is providing assistance through outside providers and professional development activities targeted to areas where schools did not make AYP.

Public School Choice: Washington Community Schools was able to provide evidence that it implemented Public School Choice. Several parents from Lena Dunn Elementary and Helen Griffith Elementary opted for Choice transfers. Records were kept indicating parents' choices and transfers granted.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 4

Notification to Parents: Washington Community Schools provided evidence of developing the letter to inform parents of the school improvement status and their option to transfer to another school for both Lena Dunn Elementary and Helen Griffith Elementary for the 2007-2008 school year. The letters were developed in both English and Spanish. However, Washington Community Schools did not provide evidence of distribution to parents.

Required Action: Washington Community Schools must ensure that documentation of distribution of school improvement letters is kept in future years. IDOE accepts that notification was sent to parents this current year since evidence existed that parents were participating in Choice (i.e., transfer forms). School improvement letters must be distributed through either a mailing or a systematic method so that documentation can be provided.

School Improvement Plans: Washington Community Schools provided evidence that both Title I schools had current school improvement plans that contained all statutory components. However, the plans were not revised with parents.

Required Action: Washington Community Schools must ensure that school improvement plans are revised for the 2008-2009 school year, in consultation with Title I parents.

Peer Review of School Improvement Plans: Washington Community Schools did not provide evidence of a peer review process for school improvement plans at Lena Dunn Elementary or Helen Griffith Elementary. (NCLB 1116(b)(3)(E)(ii) states, “...*within 45 days of receiving a school plan, the LEA shall promptly review the school plan...*”).

Required Action: Washington Community Schools must ensure that a peer review process is completed for both schools’ improvement plans for 2007-2008. Evidence of the peer review, such as compiled comments from reviewers that were given to principals, must be submitted to IDOE.

Monitoring Topic 5: Compliance with District Improvement Requirements

Background

IDOE interviewed the Title I Program Administrator regarding district improvement requirements.

Statutory Requirement: District (local educational agency) improvement requirements are contained in §1116(c).

Areas of Compliance

LEA Improvement Plan: Washington Community Schools submitted their LEA improvement plan to the IDOE in a timely manner. Feedback and determinations of any future technical assistance needs will be provided by IDOE.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 5

Notification to Parents: Washington Community Schools did not have evidence of mailing home LEA improvement letters to parents.

Required Action: Washington Community Schools must ensure distribution of LEA improvement letters, through either a mailing or a systematic method so that documentation can be provided. Evidence of distribution for 2007-2008 must be provided to IDOE within 30 business days of the date of this letter.

Monitoring Topic 6: Compliance with Schoolwide Program Requirements

Background

Washington Community Schools did not have any schoolwide programs.

Statutory Requirement: The schoolwide program requirements are contained in Section 1114. In general, in an eligible schoolwide program school, federal, state, and local funds can be combined to upgrade the entire educational program (except Reading First funds). Unlike a targeted assistance school, where certain students must be identified for Title I services, in a schoolwide program school all students are considered to be eligible for services and the goal is to upgrade the entire educational program of the school. In addition, in a schoolwide school, schools are not required to maintain separate fiscal records, by program, that identify activities supported with particular funds as long as the school maintains records that demonstrate that the schoolwide program, as a whole, addresses the intent and purposes of each Federal program that was consolidated.

Monitoring Topic 7: Compliance with Targeted Assistance Program Requirements

Background

IDOE interviewed the Title I Program Administrator and two Title I building principals regarding Targeted Assistance Programs.

Statutory Requirement: The targeted assistance program requirements are contained in Section 1115. In a targeted assistance school, a school must maintain a list of eligible children who receive Title I services. Eligible children are children identified by the school as failing, or most at risk of failing, to meet the State's challenging student academic achievement standards.

Areas of Compliance

Coordination with Regular Educational Program: Washington Community Schools demonstrated that the Title program coordinates with the regular education program. Title I staff have fixed daily schedules and are in classrooms on a regular basis.

Student Selection: Washington Community Schools provided evidence that a student selection process, which includes the use of at least two objective criteria, is done for each grade level served by Title I. The lowest achieving students are selected and served.

Progress Monitoring: Washington Community Schools demonstrated that the progress of Title I students is assessed regularly through districtwide quarterly assessments.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 7

None.

Monitoring Topic 8: Compliance with School Ranking and Serving Requirements

Background

IDOE interviewed the Title I Program Administrator regarding the Title I ranking and serving requirements.

Statutory Requirement: The ranking and serving requirements are contained in Section 1113.

Areas of Compliance

Ranking and Serving: Washington Community Schools demonstrated compliance with the statutory requirements for ranking and serving.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 8

None.

Monitoring Topic 9: Compliance with Comparability Requirement

Background

IDOE interviewed the Title I Program Administrator regarding the Title I comparability requirement.

Statutory Requirement: The comparability requirement is contained in Section 1120A.

Areas of Compliance

Comparability Report: Washington Community Schools was compliant with the comparability requirements for school year 2006-2007. Comparability will be calculated later in the fall for school year 2007-2008.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 9

None.

Monitoring Topic 10: Compliance with Maintenance of Effort

Background

The Indiana Department of Education conducts yearly review of maintenance of effort for all Title I schools.

Statutory Requirement: The maintenance of effort requirements are contained in Section 1120A of Title I and Section 9521 of the general provisions section of NCLB.

Areas of Compliance

Washington Community Schools met compliance with the maintenance of effort requirement in 2006-2007.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 10

None.

Monitoring Topic 11: Compliance with Equitable Services to Private School Students Requirements

Background

IDOE interviewed the Title I Program Administrator regarding services to nonpublic school students.

Statutory Requirements: The equitable services requirements are contained in Section 1120.

Areas of Compliance

Eligible Students: Washington Community Schools provided evidence that participating nonpublic school children are residents of an eligible public school attendance area.

Student Selection: Washington Community Schools provided evidence that appropriate criteria was used to identify eligible 1st and 2nd graders for Title I services.

Equitable Services: Washington Community Schools provided evidence of equitable services to the nonpublic school. Services were determined through the consultation with the nonpublic official and the Title I Program Administrator.

Consultation with Nonpublic Officials: Washington Community Schools provided evidence that timely and meaningful consultation took place between the district and nonpublic schools. The Title I Program Administrator annually sends a letter to the nonpublic school to verify participation and begin the consultation process.

Administration of Non-Public Program: Washington Community Schools provided evidence that it maintains control of the Title I program at the nonpublic school.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 11

Evaluation of Program: Washington Community Schools did not provide evidence that an evaluation of the program is done at the nonpublic school.

Required Action: Washington Community Schools must ensure that an evaluation, at least annually, of the nonpublic school program is effective and meeting the needs of Title I served students. Evidence of an evaluation for 2007-2008 must be submitted to IDOE.

Monitoring Topic 12: Compliance with Statutory Set-aside

Background

IDOE interviewed the Title I Program Administrator and Corporation Treasurer regarding the Title I statutory set-aside requirements. Fiscal documents were reviewed prior to and during the onsite visit.

Statutory Requirements: The statutory set-aside requirements are contained throughout Title I, including required reservations for neglected and delinquent children; homeless children, public school choice, supplemental educational services, school improvement, parental involvement and professional development (see Sections 1113, 1116, and 1118).

Areas of Compliance

Homeless students: Washington Community Schools did not reserve funds for homeless students in non-Title I buildings in the corporation. The district explained a process for identifying homeless, through teacher or principal knowledge and returned mailings. No students in non-Title I buildings have been identified.

20 Percent Choice/SES: Washington Community Schools did not reserve funds for Choice transportation per existing bus routes. There were no additional costs for seventeen Choice routes.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 12

10 Percent Professional Development for LEA Improvement: Washington Community Schools was required to set aside \$44,798.99 (10% of its 2006-2007 allocation) for LEA improvement. Washington Community Schools budgeted \$45,899.78, but could only provide evidence of expending \$32,691.04.

In addition, some professional development funds were expended on refreshments for after school remediation and instructional supplies (\$1,498.83).

Required Action: Washington Community Schools must submit an amendment to the 2007-2008 Title I grant to show LEA improvement carryover funds of \$13,606.78. These funds must be carried into the same line item (i.e., LEA professional development expenses) and expended by the end of the fiscal year.

10 Percent Professional Development for School Improvement: Washington Community School's Griffith Elementary was required to set aside \$16,371.74 (10% of its 2006-2007 school allocation) for professional development due to school

improvement status. Griffith budgeted \$16,445.00, but could not provide evidence that Title I funds were used for any expenditures.

Required Action: Washington Community Schools must submit an amendment for the 2007-2008 Title I grant to show school improvement carryover funds of \$16,371.74. These funds must be carried into the same line item (i.e., school professional development expenses) and expended by the end of the fiscal year.

Monitoring Topic 13: Compliance with Supplement, not Supplant

Background

IDOE interviewed the Title I Program Administrator and Corporation Treasurer regarding the Title I supplement, not supplant requirements. Fiscal documents were reviewed during the onsite visit.

Statutory Requirement: Section 1120A requires Title I funds to supplement, not supplant non-Federal sources of funds.

Areas of Compliance

Targeted Assistance School (TAS) Program Expenditures: Washington Community Schools showed evidence that in school year 2006-2007, Title I funds were used for expenditures related to the implementation of the Title I program, although Washington Community Schools did not show evidence that the Chart of Accounts was followed when posting expenditures in school year 2006-2007. However, the LEA did demonstrate that measures are in place for school year 2007-2008 to ensure that Title I funds are appropriately budgeted and expended.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 13

None.

Monitoring Topic 14: Compliance with Financial Management Systems Requirements

Background

IDOE interviewed the Title I Program Administrator and the Corporation Treasurer regarding the financial management system.

Regulatory Requirement: Section 80.20 (b)-(i) of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements financial management systems for non-State grantees (such as school districts).

Areas of Compliance

Verification of Contracted/Professional Services: Washington Community Schools provided evidence that consultants are working the amount of time for which they are paid. The Title I Program Administrator attends all meetings with consultants. The schools keep sign-ins and agendas of all meetings with consultants.

Audit Findings: Washington Community Schools did not have any audit findings from Indiana State Board of Accounts.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 14

Financial Management and Internal Control: Washington Community Schools did not provide evidence that expenditures were properly coded to Title I. For instance, snacks for after-school remediation were charged to professional development. In a random sample, a claim from 2006-2007 showed that the district first exhausted all Title I funds, and then used general funds to cover some expenses. For instance, travel to Title I, Gifted and Talented, and other events were paid for the Title I Program Administrator; however, there was no indication on the claim as to which expenditures were Title I.

Additionally, expenditures were not approved in the application before being purchased.

Required Action: Washington Community Schools must ensure that a process is in place to ensure that Title I funds are budgeted appropriately to cover expenses related to the program. The LEA must also ensure that expenditures, such as professional development, are properly charged to Title I. Internal controls must be established to ensure that all expenditures are approved by the Title I Program Administrator before being purchased.

Washington Community Schools must also ensure that it follows the Chart of Accounts and puts measures in place to improve internal controls.

Fiscal Reports: Washington Community Schools did not file all 2006-2007 Quarterly Monitoring Reports (2nd quarter report was not filed). The 2006-2007 Final Expenditure Report is due by October 30, 2007.

Required Action: Washington Community Schools must ensure that quarterly fiscal reports for 2007-2008 are filed on time.

Salaries and Benefits: Washington Community Schools did not provide evidence that personnel stated in the 2006-2007 application matched fiscal records for Title I expenditures. A paraprofessional was budgeted and approved at one school but was actually working at the other school.

Required Action: Washington Community Schools must ensure that personnel in the application match fiscal records.

Best Value for Contracted Services: Washington Community Schools did not provide evidence that contracted services were the best value. The LEA did not formally enter into contracts, but had agreements for consultant services. Some of those agreements were incomplete, missing dollar amounts and deliverables.

Required Action: Washington Community Schools must ensure that contracted services are the best value. The LEA must also ensure that all contracts or agreements include all required components under EDGAR 80.36.

Expenditures are Reasonable, Allocable, and Necessary: Washington Community Schools did not provide evidence that Title I expenditures are reasonable, allocable, and necessary. Inappropriate expenses included gas cards (\$330.00), dinner receipt for one person attending a professional development conference (\$77.64). Additionally, other items purchased were allocable for the Title I program, but were budgeted and expended from the wrong account, for example, instructional supplies were paid from contracted services.

Required Action: Washington Community Schools must ensure that all purchases with Title I funds are reasonable, allocable, and necessary.

Washington Community Schools must submit an amendment to the 2007-2008 Title I grant to show a chargeback of \$407.64 for expenditures that were not reasonable, allocable, and necessary. Evidence of the chargeback must be submitted to IDOE.

Monitoring Topic 15: Compliance with Compensation for Personnel Services Requirements

Background

IDOE interviewed the Title I Program Administrator regarding compensation for personnel services requirements.

Circular Requirement: OMB Circular A-87, Attachment B, Section 8 details the requirements for all compensation for personnel services supported with federal funds. This section includes the time distribution and semi-annual certification requirements.

Areas of Compliance

Compensation for Personnel Services Requirements (Semi-annual Certification): Washington Community Schools was able to demonstrate compliance with the requirements of OMB Circular A-87.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 15

None.

Monitoring Topic 16: Compliance with Complaint Procedures

Background

IDOE interviewed the Title I Program Administrator regarding the complaint process.

Areas of Compliance

Complaint Process: Washington Community Schools was able to demonstrate that the district has a complaint procedure that is published in the district's policy handbook. The handbook is available at the schools and central office. No complaints have been filed.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 16

None.

Monitoring Topic 17: Compliance with Equipment Requirements (OMB A-87 and EDGAR 80.36)

Background

IDOE interviewed the Title I Program Administrator and two Title I building principals regarding equipment acquired with Title I, Part A funds.

Regulatory Requirement: Section 80.36 of the Education Department General Administrative Regulations (EDGAR) details the threshold requirements for the use, management and disposition of equipment acquired with federal funds by non-State grantees (such as school districts).

Areas of Compliance

Disposition of Equipment: Washington Community Schools was in the process of updating the 2007-2008 Policy Handbook, which includes a new disposition policy.

Inventory List: Washington Community Schools showed evidence of an updated 2007-2008 equipment and technology inventory list that met all required components.

Equipment Labeling: Washington Community Schools showed evidence that equipment purchased with Title I funds was properly labeled and identified.

Findings of Non-Compliance, Required Actions, and Recommendations for Monitoring Topic 17

None.

Monitoring Topic 18: Compliance with Neglected Institutions Funded through Title I, Part A

Background

Washington Community Schools does not have any neglected institutions funded through Title I, Part A.

**Monitoring Topic 19:
Compliance with Delinquent Institutions
Funded through Title I, Part D, Subpart 2**

Background

Washington Community Schools does not have any delinquent institution funded through Title I, Part D, Subpart 2.

